

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ALFONSO JESUS GALINDO,
Plaintiff,

v.

**AMERIHOM MORTGAGE
COMPANY, LLC,**
Defendant.

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CIVIL ACTION NO. 4:19-cv-1732

DEFENDANT'S STATEMENT REGARDING REMOVAL

TO THE HONORABLE UNITED STATES JUDGE:

Pursuant to Court's order of May 14, 2019, Defendant AMERIHOM MORTGAGE COMPANY, LLC ("Amerihom") files Defendant's Statement Regarding Removal and would show unto the Court the following:

1. Defendant was served on April 11, 2019.
2. No defendants that have been served are residents of Texas. The sole member of Amerihom is Aris Mortgage Holding Company, L.L.C., which is a resident of Delaware. The sole member of Aris Mortgage Holding Company, L.L.C. is A-A Mortgage Opportunities, LP, which is a resident of Delaware. The limited partners of A-A Mortgage Opportunities, LP are as follows:

-) Apollo Credit Opportunity Fund III AIV LP, which is a resident of Delaware.
-) Athene Annuity and Life Assurance Company, which is a resident of Delaware.
-) Athene Annuity and Life Company, which is a resident of Iowa.
-) American Equity Investment Life Insurance Company, which is a resident of Iowa.
-) Structured Annuity Reinsurance Company, which is a resident of Iowa.

) Midland National Life Insurance Company, which is a resident of North Dakota.

) Amerihome Management, which is a resident of California.

3. The amount in controversy is the value of the property at issue, or \$490,603.00, according to the Harris County Appraisal District. *See Exhibit “F”* to Defendant’s Notice of Removal.

4. This action has not been pending for more than one year.

5. There is no defendant that did not join in Defendant’s Notice of Removal.

Respectfully submitted,

**BARRETT DAFFIN FRAPPIER TURNER
& ENGEL, LLP**

/s/ Crystal Gee Gibson
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ATTORNEY FOR DEFENDANT
AMERIHOM MORTGAGE COMPANY, LLC

CERTIFICATE OF SERVICE

On May 24, 2019 I certify that a copy of the foregoing was served as indicated to the following:

Via E-Service
Robert “Chip” Lane
6200 Savoy Drive, Suite 1150
Houston, Texas 77036

/s/ Crystal Gee Gibson
Crystal Gee Gibson